

EXHIBIT 8

Affidavit of Richard D. Lamm

AFFIDAVIT OF RICHARD D. LAMM

Before me, the undersigned authority, personally appeared, Richard D. Lamm, who upon being first duly sworn, states as follows:

1. My name is Richard D. Lamm and I live at 5401 E. Dakota #20 in Denver, Colorado. I have lived in Colorado continuously since 1961.
2. I was in the Colorado State Legislature from 1967 to 1974, and I served as the Governor of Colorado from 1975 to 1987, in both capacities as a member of the Democratic Party. I am a lawyer and Certified Public Accountant. I am currently a professor of Public Policy at the University of Denver and am Co-Director of the Institute for Public Policy Studies at the University. While governor, I wrote or coauthored six books: *A California Conspiracy*, with Arnold Grossman (St. Martin's Press, 1988); *Megatraumas: America in the Year 2000* (Houghton Mifflin Company, 1985), *The Immigration Time Bomb: The Fragmenting of America*, with Gary Imhoff (Dutton and Company, 1985), 1988, with Arnie Grossman (St. Martin's Press, 1985), *Pioneers & Politicians*, with Duane A. Smith (Pruett Publishing Company, 1984) and *The Angry West*, with Michael McCarthy (Houghton Mifflin Company, 1982). I have been chairman of the Pew Health Professions Commission and a public member of the Accreditation Council for Graduate Medical Education. I am a member of Californians for Population Stabilization (CAPS).

3. I have been deeply involved in the environmental movement for decades and have always been concerned about out of control population growth. I served as President of the First National Conference on Population and the Environment. My involvement with the environmental movement comes from the deep love of the outdoors that my parents instilled in me as a child. I lived in a very rural community in northern Illinois until I was 12, when my family moved to Pittsburgh, Pennsylvania where I graduated high school. In my childhood and high school years, I hunted, fished, hiked, and held a variety of outdoor jobs, including at a resort where I had to fly up to Canada, a deckhand on an ore boat in the Great Lakes, and a lumber camp in Oregon. I believe that the concerns of those who love the outdoors the most are harbingers for the rest of society, as it is our values that are compromised first by the overwhelming forces in our society pushing us towards constant growth and consumption.

4. I have never understood how any environmental organization can ignore one of the top environmental issues of society—population, and its ultimate demographic impact. Groups like the Sierra Club could win absolutely every battle it fights for, legislatively, and still lose America's incredible natural heritage by ignoring population. If present immigration continues, you still will have a terrible and poor environment in the U.S. with half a billion people. I think it is environmental malpractice to ignore immigration. Yet so many environmental

groups just ignore immigration in pursuit of smaller, though important issues. They ignore the looming issue of the demographic destiny of the United States. How many people can live satisfied lives in an ecosystem within the carrying capacity of our region?

5. I lived in California from 1958 until 1961, while I attended law school at Berkeley. At the time, I experienced a state which was, even then, under large environmental stress. I was offered some attractive jobs in California, but came to Colorado because I was already appalled at what population growth was doing to California. Since then, of course, largely as a result of foreign immigration, California's population has never stopped swelling. Concern over this out of control population growth was why I joined CAPS. Back in the 1960s, moving to Colorado to find the great, unspoiled outdoors was still an option. Those options are rapidly disappearing.

6. The first time I came to Colorado was in 1957, right after I finished Basic Officer's Training School, and on my way to Officer Candidate School in Colorado Springs. I fell in love with the state at first sight. I was travelling there in an old car with my skis on the top, and when I hit the state line, I saw a big flight of geese flying over a sign that said: "Welcome to Colorado." I felt like Brigham Young looking at Salt Lake, and I said: "This is the place," and, after law school, Colorado was the place I settled.

7. When I first moved to Denver, it was an incredibly lovely little town, and the air was so clean, that when the sun hit it, it practically sparkled as if little diamonds had been cut into it. In those days, it was a wonderful medium sized town; there was no sprawl. In the days when I launched my political career, Denver politics were driven by the women's movement, the civil rights movement, the environmental movement, and the anti-Vietnam war movement, all of which I supported. In those days, Denver politicians like myself were idealists—we truly believed in those causes.

8. In the over five decades that I have made Colorado my home, I have embraced and cherished its wilderness. I have climbed 50 of Colorado's 14,000 ft. peaks, hiked and skied its mountains, and kayaked in its rivers, including the Green River and the Yampa River. In those days, these rivers were magnificent and unspoiled—and because the number of people in Colorado was so small then, they didn't seem under any threat of being dammed to serve the needs of the surrounding population, as had happened to the Colorado River in the 1950's and 1960's when the Glen Canyon Dam was built in Arizona. The creation of that dam had done so much damage to the wilderness, and yet, in those days, environmentalists could still console themselves that other rivers were still safe. But uncontrolled population growth will ultimately threaten much more. Sadly, in the time I have lived here, I have watched Colorado go from a lovely state with a

high quality of life to a Colorado whose front range (from Pueblo to Fort Collins) is rapidly becoming a Los Angeles of the Rockies. That unspoiled, beautiful Colorado that stirred me so deeply has fallen victim to population growth, which is inseparable from mass foreign immigration. Denver County, where I live, added almost 200,000 individuals in the 24 years from 1990 to 2014, to increase the population from about 467,610 to 633,777. Immigration has contributed a great deal to that growth. Immigrants were about 7.4% of Denver County in 1990. That percentage jumped to 16% in 2014. The same story holds for Denver's surrounding counties. Adams County grew from 265,000 in 1990 to 461,558 in 2014. The percentage of immigrants in Adams County doubled during those 24 years, from 7.4% of the county's population to 15.1%. Arapahoe County saw huge growth during the same period, from 391,000 in 1990 to almost 600,000 in 2104. In 1990, immigrants comprised 5% of the population; that figure was tripled in 2015, to 15% of the total Arapahoe County population.¹

Another set of census numbers tells the same story of Colorado's population growth, driven in significant part by mass immigration. In 1970, Colorado had a population of about 2.2 million; about 4% of that total was comprised of

¹ Bryan Griffith & Steven Camarota, County Map: Growth of Adult Immigrant Population, 1990 to 2014, Center for Immigration Studies (Sept. 2016), <http://cis.org/Immigration-Maps/Growth-Immigrant-Population-Counties-1990-2014> (all county figures from Denver, Arapahoe, and Adams counties come from the Center for Immigration Studies).

immigrants and their children. A mere thirty years later, Colorado's population had nearly doubled to 4.3 million; a half a million people or about 12% were immigrants and their children. By 2015, Colorado had added another 1.2 million people for a total population of about 5.5 million. Of that sum, about 774,000 or 14.2% are immigrants and their children.²

9. The environmental damage that results from population density is something that hits Colorado even worse than other places in this country. Colorado has a semi-arid climate. A person can go 100 miles from the Governor's office and see the wagon wheels of the Oregon Trail laid down 150 years ago—scars that would have grown over in almost any other part of the United States but which are still there, snaking across the landscape because we lack the precipitation to rejuvenate the landscape. We are an oasis civilization, living on the snow that collects in our high mountains in the winter. Denver would not exist but for the snows in our mountains which we impound. But these water resources are under gargantuan pressure.

10. Our tree ring laboratory in Colorado State University tells of a number of droughts in Colorado, some lasting over 20 years. I was Governor for one short drought in the 1970s and can state unequivocally that a drought of 5 years or more

² Steven Camarota & Bryan Griffith, State Map: Number of Aliens and Their Minor Children, Center for Immigration Studies (March 28, 2016), <http://cis.org/Camarota/Map-Number-Immigrants-Minor-Children> (all figures for 1970, 2000, and 2015 are provided by the Center for Immigration Studies).

would be a disaster to Colorado and if a drought lasted 15 years, we would be choosing straws to see who has to move. We drill wells and tap our aquifers but we are already down to the Mesozoic age water in our front range. We are one drought away from incredible trauma. Every county in Colorado was declared a federal drought disaster area in 2002, when the population stood at 4.5 million. In the west, civilization has triumphed because we refuse to accept limits, and our ancestors made a garden out of a desert. The West became the land of irrigation canals, transmountain diversions, pivot sprinklers, and other adaptations that allow us not only to live in a semi-arid desert, but also to enjoy green lawns and prosperity. The culture then was a culture of growth—full speed ahead growth. But nature will impose its limits someday—it is not possible for the population to continue to grow and live the same lifestyle we are accustomed to. Today, we forget that the West is no longer wide open and unsettled. As a state that had as many cycles of drought as we did, it shouldn't build up a population of ten to fifteen million people, as Colorado is currently projected to do. It is unrealistic to imagine a Colorado of eight, ten, or 12 million people, as it is currently projected to be in the next 25 years. It is unrealistic to imagine a United States of 500 million people, living our consumptive lifestyles. This unsustainable growth is now happening because of mass immigration from other countries.

11. I governed Colorado for 12 years. In my experience as Governor, mass immigration made virtually every problem I was trying to solve more difficult, fiscally as well as environmentally. The fiscal impact on our education system has been staggering. At one point, it was estimated that there were 42,000 illegal immigrant children in our school system plus thousands more legal children born to illegal immigrant mothers. In just over a decade, Denver schools have gone from 13% Hispanic to over 60% Hispanic. Education costs in Colorado are approximately \$12,000 per student plus large additional costs for teaching monolingual children who speak a foreign language. A majority of births at our large Denver Public Hospital are to monolingual Spanish speakers, and so this problem continues to be burdensome on the schools even without new immigration, because of the immigration which has already occurred.

12. The health care system throughout Colorado is also heavily fiscally impacted by immigrants who seldom have health insurance. Colorado is required to provide health care if they are medically indigent. In addition, our health care system is required to have translators available to immigrants who do not speak English.

13. Other social services feel the strain as well. Our public housing is filled with both legal and illegal immigrants. Twenty percent of our prison space is filled

by the foreign born, and State and local governments are also forced to provide translators throughout our criminal justice system.

14. Denver, particularly, is a changed place because of the sprawl caused by immigration. Not only is Colorado flooded with foreign immigrants, it is also being flooded by American born Californians who move here because they have been crowded out of California by endless foreign immigration. This is why I am a member of CAPS even though I no longer live in California. The immigration impacts on California hit Colorado.

15. When I was in the Colorado state government, I did everything I could to prevent the sprawl from changing Denver. When I was still in the state legislature in 1970, the International Olympic Committee “awarded” the 1976 Winter Olympics to Denver to host. At that time, Colorado’s population was only 2.2 million. Though development interests were thrilled at the amounts of money that would be spent, the people of Denver were not. Hosting the Olympics meant building huge amounts of infrastructure—facilities in places as far away from Denver such as Vail and Steamboat Springs, and roads to transport tens of thousands of people to see the events. It wasn’t just about the fiscal costs. We were worried about the environmental impacts and the strain on natural resources that a massive global event like the Olympics would do to Denver and to its beautiful, then undeveloped, surrounding areas. I started a small grassroots organization

called “Citizens for Colorado’s Future,” and we ended up prevailing in our fight to preserve Denver—Denver withdrew as host of the Winter Games in 1972.

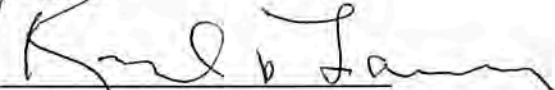
16. However, because of immigration-fueled population growth, the fate I once hoped to have saved Denver from happened anyway. Colorado’s population jumped from 2.2 million in 1970 to 5.4 million by 2014, and it is the second fastest growing state in the U.S. Denver itself is a magnet for both immigrants and residents of other states crowded out by immigrants and is one of the fastest growing metropolitan areas in the nation.

The National Environmental Policy Act (NEPA), which became law in 1970, was supposed to have stopped this kind of ill-considered population growth from happening. In the 1960s and 1970s, the environmental movement understood how important population stabilization was to everything it stood for. This emphasis in NEPA itself of the importance of population growth reflects this priority. NEPA, the bedrock of our environmental law, was designed to ensure for environmentally informed decision making and public participation by federal agencies. Federal agencies, like the Department of Homeland Security (DHS) are not supposed to carry out actions that affect the environment without first considering the consequences. What can have a greater environmental impact on our states and the nation than immigration? In the days when NEPA was passed, population growth was not substantially a matter of immigration, but now immigration is our

population's primary driver. Moreover, it is certainly the primary driver of population growth that is most within the federal government's control. Our immigration levels are ultimately a policy choice. DHS is the federal agency that actually implements our nation's immigration policies, and so DHS is responsible for carrying out the federal policy that has the greatest impact on the environment of all. And yet, DHS has done zero environmental review of its immigration related actions. Zero!

17. If DHS, and its predecessor agency the Immigration and Naturalization Service (INS) had followed NEPA as it was supposed to, perhaps my efforts to save Denver from an environmentally unsustainable, high growth future would not have been in vain. DHS must stop violating the law and must begin conducting environmental analysis of its population augmenting policies. If the public realized the environmental consequences, the projected future where Colorado's population is 12 million people might never come to pass.

FURTHER AFFIANT SAYETH NOT.


Richard Lamm

Subscribed and sworn to before me on Oct. 1, 2016, by RICHARD LAMM. He is personally known to me or has presented Colorado Driver License as identification.



NOTARY PUBLIC
STATE OF COLORADO
MY COMMISSION EXPIRES

Feb 4, 2020

SIMON CASTRO
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20164004650
MY COMMISSION EXPIRES FEBRUARY 4, 2020